

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND LTD.,  
FRONTPOINT EUROPEAN FUND, L.P., FRONTPOINT  
FINANCIAL SERVICES FUND, L.P., FRONTPOINT  
HEALTHCARE FLAGSHIP ENHANCED FUND, L.P.,  
FRONTPOINT HEALTHCARE FLAGSHIP FUND, L.P.,  
FRONTPOINT HEALTHCARE HORIZONS FUND, L.P.,  
FRONTPOINT FINANCIAL HORIZONS FUND, L.P.,  
FRONTPOINT UTILITY AND ENERGY FUND, L.P.,  
HUNTER GLOBAL INVESTORS FUND I, L.P.,  
HUNTER GLOBAL INVESTORS FUND II, L.P.,  
HUNTER GLOBAL INVESTORS OFFSHORE FUND  
LTD., HUNTER GLOBAL INVESTORS OFFSHORE  
FUND II LTD., HUNTER GLOBAL INVESTORS SRI  
FUND LTD., HG HOLDING LTD., HG HOLDINGS II  
LTD., and FRANK DIVITTO, on behalf of themselves and  
all others similarly situated ,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG,  
JPMORGAN CHASE & CO., THE ROYAL BANK OF  
SCOTLAND PLC, UBS AG, BLUECREST CAPITAL  
MANAGEMENT LLP, DEUTSCHE BANK AG, DB  
GROUP SERVICES UK LIMITED, and JOHN DOE  
NOS. 1-50,

Defendants.

Case No. 15-cv-00871 (SHS)

**DECLARATION OF JENNIFER LOBATO-CHURCH IN SUPPORT OF THE ROYAL  
BANK OF SCOTLAND PLC'S MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

I, Jennifer Lobato-Church, hereby declare under penalty of perjury the truth of the following statements based upon personal knowledge and knowledge gained from the review of corporate records of The Royal Bank of Scotland plc ("RBS plc"), and from discussions with others with such knowledge:

1. I am an adult and competent to testify to the matters below. I submit this declaration in support of the motion to dismiss for lack of personal jurisdiction of RBS plc.

2. I am a Director, Senior Counsel of RBS Securities Inc. My responsibilities include, among other things, addressing corporate governance and secretariat issues in relation to activities in the United States by members of the RBS family of businesses. I am authorized to make this declaration on behalf of RBS plc.

3. RBS plc is a United Kingdom corporation headquartered and incorporated in Scotland, United Kingdom, with its principal offices at Gogarburn, Edinburgh, EH12 1HQ and 280 Bishopsgate, London, EC2M 4RB.

4. RBS plc's principal place of business is the United Kingdom. RBS plc has more than 50,000 employees worldwide. All but approximately 4,900 of those employees are based in the United Kingdom.

5. RBS plc's operations in the United States are small compared to its operations outside of the United States.

6. In addition to its principal and other offices in the United Kingdom, as of December 31, 2014, RBS plc had more than 550 retail branches located in the United Kingdom and offices in more than 30 other non-U.S. jurisdictions worldwide.

7. In the United States, RBS plc's presence consists of a single branch office located in Stamford, Connecticut, smaller representative offices in Chicago and New York, and a license for a representative office in Jersey City, New Jersey.

8. Of RBS plc's approximately 50,000 employees worldwide, less than 250 are based in the United States, and most of those are based in RBS plc's only U.S. branch office (in Stamford, Connecticut).

9. RBS plc's revenue attributable to the United States (including through direct and indirect subsidiaries) is also small as compared to its revenue worldwide. As reported in the 2014 annual report of RBS plc, only 6% of the global revenue of RBS plc and its direct and indirect subsidiaries in 2014 was attributable to the United States (versus 81% from the United Kingdom).

10. During the relevant time, all submissions of rates to the British Bankers' Association for use in the calculation of Swiss Franc LIBOR were made from RBS plc's offices in the United Kingdom, not from any offices in the United States.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of August, 2015 in Stamford, CT.

  
Jennifer Lobato-Church